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*Attorney for Plaintiff and Counter-Defendant
Moog Inc.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,

Plaintiff,

v.

SKYRYSE, INC. ROBERT ALIN
PILKINGTON, MISOOK KIM, and
DOES NOS. 1-50,

Defendants.

Case No. 2:22-cv-09094-GW-MAR

**PLAINTIFF AND COUNTER-
DEFENDANT MOOG INC.'S
APPLICATION FOR LEAVE TO
FILE UNDER SEAL DESIGNATED
MATERIALS FROM AMENDED
TRADE SECRET IDENTIFICATION**

Judge: Hon. George H. Wu
Magistrate Judge: Hon. Margo A.
Rocconi

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SKYRYSE, INC.,
Counterclaimant,
vs.
MOOG INC.,
Counter-Defendant.

1 **TO THE ABOVE CAPTIONED COURT, AND TO ALL PARTIES**
2 **AND THEIR ATTORNEYS OF RECORD:**

3 Pursuant to Local Rule 79-5 *et seq.*, Plaintiff and Counter-Defendant Moog
4 Inc. (“Moog”) hereby submits this application for an order permitting it to file under
5 seal certain excerpts and documents (the “Designated Materials”) from Moog’s
6 Amended Trade Secret Identification (“Amended TSID”), filed pursuant to
7 Magistrate Judge Margo A. Rocconi’s June 14, 2023 Order (Dkt. 534), and the
8 Parties’ Joint Stipulation filed on July 7, 2023 (Dkt. 573).

9 Moog submits that compelling reasons exist to permit the Designated
10 Materials to be filed under seal. The Designated Materials include documents and
11 information that have been identified as Protected Material pursuant to the
12 Protective Order entered in this action on May 6, 2022 (the “Protective Order”)
13 (Dkt. 89), which are referenced and/or set forth in the Amended TSID. Here, the
14 Designated Material at issue constitutes Moog’s comprehensive Amended TSID and
15 attachments thereto, which are all designated as “HIGHLY CONFIDENTIAL—
16 OUTSIDE COUNSEL AND EXPERTS’ EYES ONLY” under the Protective Order
17 (Dkt. 89). Moog’s Amended TSID contains a detailed explanation and identification
18 of Moog’s various trade secrets at issue in this case, and Moog keeps this
19 information secret. The names of Moog’s sensitive government programs are also
20 kept secret from the public. Public disclosure of this information would cause Moog
21 competitive harm. The Designated Materials contain Moog’s confidential and
22 proprietary intellectual property, technical information, internal information,
23 materials, and processes; marketing and business information; and/or financial
24 information, which Moog designated as Protected Material pursuant to the
25 Protective Order. If this information were to be made available to the public,
26 Moog’s competitors would be given deep insight into Moog’s technical capabilities
27 and business plans, and could gain an unfair competitive advantage.

Specifically, Moog seeks to file the following Designated Materials under seal:

DOCUMENT	Designating Party	Text to be Filed/Lodged under Seal
Moog's Amended Trade Secret Identification (Non-CUI)	Moog	Sealed in its entirety.
Exhibits 1-2 to Moog's Amended Trade Secret Identification (Non-CUI)	Moog	Sealed in its entirety.
Moog's Amended Trade Secret Identification (CUI)	Moog	Sealed in its entirety.
Exhibit A to Moog's Amended Trade Secret Identification (CUI) ¹	Moog	Sealed in its entirety.

This application is further based upon the accompanying Declaration of Kazim Naqvi in Support of this Application; any pleadings, files, and records in this action; and any further evidence or argument as this Court may consider.

¹ Because Exhibit 2 to Moog's Amended TSID (Non-CUI) and Exhibit A to Moog's Amended TSID (CUI) are voluminous, native excel spreadsheets with multiple tabs that cannot be readily filed in PDF format on the Court's CM/ECF system, Moog will separately lodge those attachments with the Court via encrypted hard drive.

1 Dated: August 31, 2023

2 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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4 By /s/ Kazim A. Naqvi
Kazim A. Naqvi

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6 Attorney for Plaintiff and Counter-Defendant
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